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NASA Procedural Requirements

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Chapter 5. Requirements for Management of Records in E-mail, Cloud, and Social Media

5.1 Determining Records in Electronic Formats or Media

5.1.1 Electronic content may constitute a Federal record if it meets the definition of records, regardless of whether it takes the form of an e-mail or other electronic communication such as a text or instant message, or if the content was created using social media applications internal and external to the Agency, including collaborative environments.

5.1.2 Content generated using communication or social media applications is likely a Federal record if there is an affirmative answer to one or more of the following non-exhaustive list of questions when considered in conjunction with the definition of Federal records:

a. Does it contain evidence of the Agency's policies, business, or mission?

b. Is the information available only on the social media site?

c. Does the Agency use the tool to convey official Agency information?

d. Is there a business need for the information?

5.1.3 Employees should consult with their Center Records Manager when in doubt as to whether content constitutes record material. The default assumption should be that it does constitute record(s).

5.2 Managing Information in Cloud Computing

5.2.1 If NASA information/data processed or maintained via cloud services meets the definition of a Federal record, RM functionality is required in the cloud environment, or alternative plans should be established for meeting records requirements.

5.2.2 If the cloud is used only as space in which the Agency is storing data and performing functions with the data using non-cloud furnished capabilities, then RM functionality does not need to be addressed in the agreement. However, issues that should be addressed before entering into a cloud initiative agreement include such things as cloud environment security in compliance with NASA IT security policies and the destiny of any Agency data/records stored therein should the cloud provider cease operation.

5.2.3 NASA Service Executives establishing service-level agreements for cloud initiatives shall consult their Center Records Manager in considering whether an agreement should include records management requirements.

5.3 Managing Social Media Content

5.3.1 Social media should not be used external to the Agency for creation or posting of content that rises to the definition of Agency records unless, in consultation with the Center CIO, a plan is established for how the records will be harvested or captured and managed by the Agency in accordance with the NRRS. 5.3.2 When internal social media applications contain NASA records, application owners shall either provide RM functionality that provides the controls required by 36 CFR 1236 and the functionalities discussed in IT-HBK-1440.01, or establish written procedures that are approved by the Center Records Manager for how the records will be managed and disposed of in accordance with the NRRS.

5.4 Managing E-Communications Records

5.4.1 The content and metadata of e-mail messages created and used in the conduct of official Agency business are considered official Federal records if the information content meets the definition of Federal records as described in Section 1.1. See Table A for basic criteria to assist with determining which messages are records. There are many messages that may be sent or received by NASA employees that do not conduct Agency business and, therefore, are nonrecords. Based on content and use of the e-mail, the following decisions need to be made:

a. Whether a message constitutes a record and, if so,

b. Suitable retention for the message before disposition.

5.4.2 Table A provides basic criteria to aid individuals and offices in determining the record status and retention of their messages. However, NRRS 1441.1, NASA Records Retention Schedules, is always the authoritative source for retention.

5.4.3 NASA utilizes a "Capstone" approach to capture and manage e-mail records in accordance with NARA-issued Bulletin 2013-02. Using this approach, the Agency categorizes and schedules all e-mail of certain senior managers, based on the work and/or position of the e-mail account owner.

5.4.4 In NASA's implementation of this Capstone approach, the following are required:

a. Each Center Records Managers shall maintain an up-to-date list of senior managers whose e-mail records are permanent as described by NRRS 1/22.A.1 or NRRS 8/101. With concurrence of the NASA Records Officer, updates to the senior management list are provided to the Agency e-mail service provider as Center personnel changes occur. The list may be found under "Electronic Records Management" on the internal NASA Records Management Website.

b. The NASA CIO shall require the e-mail service provider to capture the e-mails and accompanying metadata of Capstone e-mail account holders specified by Center Records Managers or the NASA Records Officer and, upon a manager's departure, provide their records for transfer to the National Archives.

5.4.5 For all other NASA users, e-mail messages that are either of nonrecord or transitory value may be allowed to reside in the NASA Operational Messaging and Directory Service (NOMAD) e-mail system, and may be destroyed after 180 days, if not subject to legal hold.

Table A. Basic Criteria Determining E-mail Record Status and Retention

Basic Criteria for Determining E-mail Record Status and Retention				
If e-mail message is:	**NRRS Citation**	**Series Title**	**Disposition**	**How to Handle**
Strictly personal or non-business related		Non-record (personal or of a non-NASA nature)	Destroy Immediately or when no longer needed	Destroy at will or after 180 Days
Business related, but of little or no substantive value	1/78G	Transitory Files (minimal or no documentary or evidential value)	Destroy immediately or when no longer needed for reference, or under a predetermined schedule or business rule	Destroy after 180 Days
Related to employee's NASA function & not covered by another specific retention schedule	1/78F.2	Administrative Records for NASA Function	Cut off at end of fiscal or calendar year. Destroy/delete 5 years after cutoff.	Destroy 5 years after cutoff
Related to employee's NASA function e-mail content has its own schedule – See "Series Title" column.	Various Schedules	Whatever series governs records to which the content of the e-mail is related (e.g., Project Mgmt, Contract direction, etc.)	Varies, depending on the appropriate schedule item	Follow specific retention instructions
Business related and created or received by Senior managers described in NRRS 1/22A.1.	1/22A.1	Records of Top Management Officials (Administrator, Center Directors, deputies & associates who help execute the functions of the Administrator and Center Directors; and heads of Agency or Center Mission Directorates or other direct mission support offices.)	Permanent	Transfer to NARA when 10 years old.
Business related and created or received by heads of other offices as described in NRRS 1/22A.2.	1/22A.2	Records of Top Management Officials (Heads of all other offices, e.g., functional offices concerned with Agency or Center infrastructure and administration, such as CIO, CFO, Human Capital, Facility Operations organizations, etc.)	Temporary	Cut off at end of fiscal or calendar year. Destroy/delete between 5 and 15 years after cutoff.

5.4.6 The Agency has implemented a two-pronged approach for managing all other NASA users' e-mail records (with longer than 180-day retention) as follows:

a. The NASA CIO shall identify and implement an Agency-wide recordkeeping solution to properly manage and dispose of e-mail records, using a traditional records management approach or the Capstone approach of position-based retention.

b. Until such time as the CIO implements an automated NASA e-mail records solution, individual users shall maintain e-mail records of longer duration than transitory (180 day retention) value in accordance with the retention schedule appropriate to the subject and content of the message. Their content and attachments are to be captured by the individual user, together with date/time sent and distribution metadata, and retained in the same system in which their related non-e-mail official records are stored or in systems/locations where their protection, retention, and recovery can be ensured. These messages may be captured and stored in Outlook Personal Storage Table (PST) files or Portable Document Format (PDF) files, as approved by the Center RM. PST files (personal folders) are located on a user's personal and/or network storage device that require regular backups. Messages are saved in PDF using "File-Save" or "File-Print" (select Adobe PDF as the printer) options from the e-mail. When saved as a PDF file, the user must also ensure preservation of any attachment(s).

5.4.7 NASA business communications that rise to the definition of Agency records of retention value greater than 180 days shall not be created using instant messaging and text messaging services. In the event that communication of longer retention value is created, the sender and recipient have responsibility for capturing the content of and attachments to the message, together with date/time sent and distribution metadata, and saving it in the same system in which their related non-e-mail official records are stored or in systems/locations where their protection, retention, and recovery can be ensured.

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